



May 23, 2007

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-B204
Washington, DC 20554

Re: Comments **of Horizon Telcom, Inc.**
PS Docket No. 06-229 – 700 MHz Broadband Public Safety Rules
W? Docket No. 06-150 – 700 MHz Commercial Service Rules
W? Docket No. 06-169 – 700 MHz Guard Band Rules
WT Docket No. 96-86 – Meeting Public Safety Communications Requirements

Dear Mrs. Dortch

Horizon Telcom Inc. ("Horizon") wishes to express its support in the record for Frontline Wireless, LLC, and its proposal for a new "E-Block" commercial 700 MHz licensee to construct and operate a nationwide, interoperable broadband network for sharing with a national public safety licensee in the lower portion of the 700 MHz public safety spectrum.

By way of background, Horizon Telcom is a facilities-based telecommunications carrier that provides local and long distance telephone as well as Internet and network services to residential and business customers in southern Ohio. Through its subsidiary, The Chillicothe Telephone Company, Horizon has more than a 110-year history of providing reliable and innovative services to its subscribers. Chillicothe Telephone currently supplies local area telephone service to a territory covering approximately 800 square miles in Ross, Pickaway, Pike, Jackson, Hocking and Vinton Counties, Ohio. In addition, Chillicothe Telephone sells telephone equipment to businesses and offers Internet access through high-speed digital subscriber line ("DSL") technology over telephone lines. Chillicothe Telephone also offers very-high-speed digital subscriber line ("VDSL") services over telephone lines to residences as an alternative to coaxial cable television services.

Horizon has reviewed the "Public Safety Broadband Deployment Plan" offered by Frontline and believes it holds much promise. The creation of an open access, wholesale broadband 4G network will provide first responders with access to broadband capabilities; an innovative, IP-based platform upon which to develop public safety applications; maximum choice among equipment providers; local control and nationwide interoperability without the tremendous expense of network construction. At the same time, the availability of a new type of wireless broadband network – operating as a wholesale provider and under open access principles – would create business opportunities for a broad range of commercial service providers, including new market entrants, and could very well unleash a flood of innovation.

However, the success of Frontline's ambitious proposal will depend on Frontline's ability to work closely with the public safety community as well as small and rural telephone companies that will likely play an integral role in helping Frontline to meet its ambitious geographic coverage benchmarks.

Horizon believes the Commission can help to ensure that a joint public safety and commercial E-Block network is successfully deployed if it adopts rules that allow the winning E-Block bidder the flexibility to enter into partnerships and/or contractual arrangements with facilities-based carriers for the construction and management of its network in small and rural markets. By imposing uniform service and technical standards on the E-Block spectrum (*i.e.*, the same conditions that apply to the E-Block licensee), the Commission can ensure that any E-Block partner or manager fulfilled that the same network interoperability, reliability and open-access standards. To facilitate these joint operating arrangements, Horizon respectfully requests the FCC to clarify that any facilities-based providers that enter into such operating arrangements *are* not prohibited from leasing E-Block network capacity themselves (on equal terms with everybody else) or from providing wireless services to end users. The Commission must reject suggestions by Media Access Project and the Ad Hoc Public Interest Spectrum Coalition that incumbent service providers be prohibited from gaining access to the 700 MHz band either by auction or through secondary market transactions. Incumbent restrictions such as these should likewise not be applied to the E-Block spectrum or operations proposed by Frontline.

Horizon looks forward to working with Frontline or the eventual E-Block license holder in implementing its Public Safety Broadband Deployment Plan and urges the FCC to adopt rules that will facilitate the rapid build-out and ubiquitous service under open-access standards.

Respectfully Submitted
HORIZON TELCOM, INC.



William McKell
CEO